

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In Re:)	Chapter 11
)	
W. R. Grace & Co., et al.,)	Case No. 01-01139 (JKF)
)	Jointly Administered
Debtors.)	
)	Objection Deadline: January 10, 2006 @ 4:00 pm
)	Hearing Date: January 30, 2006 @ 12:00 pm

**NOTICE OF MOTION OF
ANDERSON MEMORIAL HOSPITAL FOR LIMITED RELIEF
FROM STAY UNDER SECTION 362 OF THE BANKRUPTCY CODE**

TO: THE PARTIES ON THE ATTACHED SERVICE LIST

Anderson Memorial Hospital (“Anderson”) has filed a Motion For Limited Relief From Automatic Stay which seeks a narrow Order from this Court that lifts the automatic stay for the sole purpose of making a petition to the South Carolina Court of Common Pleas, the Honorable John C. Hayes, III, to unseal the record from the class certification proceedings conducted in Anderson Memorial Hospital v. W.R. Grace & Co., et al., 92-CP-25-279.

You are required to file a response (and the supporting documentation required by Local Rule 4001-1(e)) to the attached motion on or before January 10, 2006 at 4:00 p.m.

At the same time you must also serve a copy of the response upon Anderson's attorneys:

Christopher D. Loizides, Esquire (No. 3968)
Michael J. Joyce, Esquire (No. 4563)
Loizides & Associates
1225 King Street, Suite 800
Wilmington, DE 19801

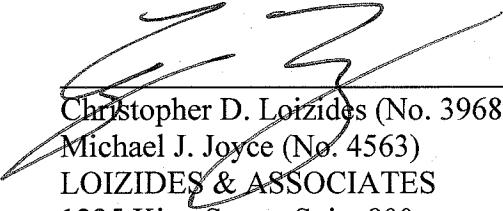
Daniel A. Speights, Esquire
Marion C. Fairey, Jr., Esquire
Speights & Runyan
200 Jackson Avenue East
P. O. Box 685
Hampton, SC 29924-0685

**ANY RESPONSE MUST BE FILED AND SERVED TOGETHER WITH A
CERTIFICATE OF SERVICE ON OR BEFORE JANUARY 10, 2006 AT 4:00 p.m.**

FAILURE TO TIMELY FILE AND SERVE A RESPONSE WILL RESULT IN AN ORDER GRANTING THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

A HEARING ON THE MOTION WILL BE HELD ON JANUARY 30, 2006 AT 12:00 P.M. BEFORE THE HONORABLE JUDITH K. FITZGERALD AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, WILMINGTON, DE 19801.

Dated: December 22, 2005


Christopher D. Loizides (No. 3968)

Michael J. Joyce (No. 4563)

LOIZIDES & ASSOCIATES

1225 King Street, Suite 800

Wilmington, DE 19801

Telephone: (302) 654-0248

Facsimile: (302) 654-0728

Email: loizides@loizides.com

-- and --

Daniel A. Speights (SC Fed. ID No. 4252)

Marion C. Fairey, Jr. (SC Fed. ID No. 6101)

SPEIGHTS & RUNYAN

200 Jackson Avenue East

P.O. Box 685

Hampton, SC 29924

Telephone: (803) 943-4444

Facsimile: 803) 943-4599

Counsel for Anderson Memorial Hospital